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October 25, 2004

Docket Nos.: 50-348
50-364

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant
Report of Unsatisfactory Performance of Kroll Laboratory

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC), the licensed operator for the Joseph M. Farley Nuclear Plant (FNP) uses Kroll Laboratory Specialists, Inc. (Kroll), Gretna, Louisiana as a laboratory and testing facility in accordance with 10 CFR 26. In accordance with 10 CFR 26, Appendix A, 2.8(e)(4), SNC is providing this letter and its Enclosure to document unsatisfactory performance of Kroll and corrective action taken to address this incident.

On September 13, 2004, SNC became aware of a mistake made by Kroll in which a typographical error occurred in the field containing the donor ID as reported on the laboratory drug test report. SNC uses this field to reference the site-specific ID for internal program administration. The Chain of Custody Form submitted with the specimen contained a pre-printed label with the site-specific ID. This was keyed incorrectly into the laboratory system by Kroll personnel resulting in the typographical error on the drug test report - specifically, F041628 was keyed as F041620. The laboratory report contained the correct laboratory accession number - 8273003 and specimen ID number - 50691887. These are numbers which Kroll uses to identify the specimen throughout their testing process.

Upon submission to the laboratory, F041628 was a performance specimen spiked with benzoylecgonine and had tested presumptive positive for cocaine during onsite testing. F 041620 was an individual's specimen presumptive positive for opiates during onsite testing.

When the laboratory report on F041620, positive for cocaine was received at the MRO's office, the MRO staff contacted the FNP Fitness for Duty Coordinator and requested an MRO interview with the individual that provided the specimen. The individual was contacted and scheduled for the MRO interview. During the interview process, the MRO noticed the discrepancy in the site-specific ID as recorded on the laboratory report. He immediately notified the FNP Fitness for Duty Coordinator and did not proceed with the interview. The FNP Fitness for Duty Coordinator contacted the SNC Corporate Health

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Services Coordinator who notified the laboratory certifying scientist of the error and requested an investigation and a corrected laboratory report

An audit performed by Kroll laboratory personnel revealed that only the site-specific ID number contained the error. All other documentation to the MRO contained the correct identification numbers. Corrected reports were issued and processed according to applicable internal procedures. F 041628 was correctly confirmed as positive for cocaine. F 041620 did not confirm for opiates and was ruled negative by the MRO. SNC has determined that unsatisfactory performance did occur; therefore, in accordance with the cited regulation, SNC is submitting this report and corrective action taken to address this incident.

SNC began utilizing Kroll in June 2004. This is the first instance of an identified laboratory error of any kind. The SNC Fitness for Duty staff will continue to exercise diligence in monitoring results and reports. SNC considers the investigation performed, deficiencies identified, and corrective actions sufficient to address this incident.

This letter contains no NRC commitments.

Sincerely,



L. M. Stinson

LMS/JMG

Enclosure: Kroll Report dated September 29, 2004

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. J. R. Johnson, General Manager – Plant Farley
RTYPE: CFA04.054; LC# 14163

U. S. Nuclear Regulatory Commission
Dr. W. D. Travers, Regional Administrator
Mr. S. E. Peters, NRR Project Manager – Farley
Mr. C. A. Patterson, Senior Resident Inspector – Farley



The Risk Consulting Company

Kroll Laboratory Specialists, Inc.
1111 Newton Street
Gretna, LA 70053
(800) 433-3823

Kroll Laboratory Specialists, Inc.

September 29, 2004

Billie Rooks
Southern Nuclear Operating Company
Safety & Health Department
P.O. Box 1295
Birmingham, AL 35201

Dear Billie:

May this letter serve to document our conversation of September 24, 2004. Kroll received Specimen ID 50691887 (Laboratory Accession number 8273003) on 9/10/2004 and reported the result as a Benzoylcegonine (cocaine metabolite) positive on 9/11/2004. The donor ID field contained a typographical error. Instead of F041628, it was entered as F041620. The report included the signed Chain of Custody as an attachment that contained the correct donor ID. Once Kroll was notified, the typographical error was corrected, a corrected report was issued and the responsible individuals were counseled.

Kroll received specimen ID 50691888 on 9/10/2004 and it was reported on 09/11/2004 as a negative result. There were no errors on this report.

We are very sorry that this typographical error occurred and regret any problems that it may have caused you.

Sincerely,

A handwritten signature in black ink, appearing to read "DAG", followed by a horizontal line.

David A. Green, Ph.D., DABCC, FACB
Laboratory Director